

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

IN RE:)
) **Case No. 23-41210-can13**
STANFORD LEN WASHINGTON,)
)
Debtor.)

MOTION TO DISMISS FOR FAILURE TO FILE 2023
TAX ASSESSMENT FORM

Comes now the Clay County Collector, by and through her undersigned counsel, Bruce E. Strauss and for her motion to dismiss for failure to file the 2023 tax assessment form, states and alleges as follows:

1. That the debtor herein failed to file his personal property tax assessment form for 2023. As a result of this failure, the Clay County Collector has been unable to issue a tax statement for 2023, although taxes will be owed based upon the personal property identified in the bankruptcy schedules.

2. That the personal property tax assessment form is due on or before March 1 of each tax year.

3. That a proof of claim for 2023 personal property taxes cannot be filed without the assessment form being filed.

4. That the Clay County Collector is requesting that this case be dismissed unless and until the 2023 assessment form is filed.

WHEREFORE, the Clay County Collector prays for an order dismissing this case and for such further relief as the court deems just.

MERRICK, BAKER & STRAUSS, P.C.

By: /s/ bruce e. strauss

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CERTIFICATE OF SERVICE

I hereby certify that on November 18, 2023, a true and correct copy of the above and foregoing was served upon all persons receiving ECF (Electronic Case Filing) notification and a paper copy mailed First Class, U.S. Mail, properly addressed with postage prepaid, to:

Stanford Len Washington
97 NE 57th Street
Bldg 2, #212
Kansas City, MO 64155

/s/ bruce e. strauss
BRUCE E. STRAUSS